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March 9, 2023

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Payamps v. City of New York, 22-cv-00563**

Dear Judge Scanlon:

As you may recall, I am counsel for Defendant Inspector Jesse Lance in this matter. I write in response to Plaintiff's letter motion, in which he seeks additional discovery.

At the outset, the Court should know that Defendant Inspector Jesse Lance was not the supervisor of the individual John Doe police officers and as such does not possess any information with regard to their identities. Additionally, he is not in a position to obtain any identifying information or ascertain the officers' individual assignments on the time and date in question. Upon information and belief, this information should be in the possession of the City Defendants' as the NYPD has the ability to go back and examine roster assignments, etc.

Finally, I ask the Court to forgive the brevity of this response because I am traveling while writing this but wanted to provide Defendant Lance's response in a timely manner.

I thank the Court for its consideration.

Respectfully submitted,

/s/

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cc:

All relevant parties by ECF.